

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

ROBERT DAVID STEELE, et al.,

Plaintiff,

vs.

JASON GOODMAN, et al.,

Defendant

Case No.: 3:17-cv-00601-MHL

DEFENDANT'S RESPONSE IN
OPPOSITION TO CO-DEFENDANT
NEGRON'S MOTION TO APPEAR BY
TELEPHONE

**DEFENDANT'S RESPONSE IN OPPOSITION TO CO-DEFENDANT NEGRON'S
MOTION TO APPEAR BY TELEPHONE**

Defendant Jason Goodman Pro Se respectfully submits this response in opposition to co-Defendant Negron's motion to appear by telephone. None of the reasons cited in the motion are unexpected circumstances that were unforeseen at the time of the scheduling and no reason is given as to why Negron has waited until now to bring these issues to the court's attention. It is important that co-Defendant Negron fulfill her obligation to appear in person, in court as agreed to and ordered.

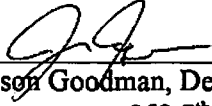
DEFENDANT'S RESPONSE IN OPPOSITION TO CO-DEFENDANT NEGRON'S MOTION TO APPEAR BY
TELEPHONE - 1

1 Co-Defendant Negron's motion to appear by telephone should be denied because Ms.
2 Negron has previously agreed to appear in person, in court as ordered. During the negotiation of
3 the schedule of that agreed upon hearing, Ms. Negron's counsel made no mention of the
4 circumstances described in the motion to appear by telephone. The motion cites the financial
5 hardship of appearing but fails to address the legal fees associated with the motion and requested
6 hearing.
7

8 Ms. Negron and her actions are cited throughout Plaintiff's amended complaint. Ms.
9 Negron publicly broadcast at least two interviews with a client of counsel for Plaintiff Steven S.
10 Biss just weeks after Biss emailed a phone number thought to be that of Negron to individuals
11 who admit to being associates and even paid operatives of Biss and his wife Tanya Cornwell.
12 These actions were the cause of the motion to disqualify Biss as counsel for Plaintiff. The
13 motion to disqualify may have played a role in Judge Lauck's decision to cancel the trial date sua
14 sponte and order this settlement hearing. It is important that the relevant parties be present at the
15 settlement despite the personal and financial hardship an in-person appearance may cause.
16
17

18 Defendant Goodman opposes co-Defendant Negron's motion to appear by telephone for
19 the reasons stated above. For these reasons in addition to any other reasons the court sees fit, co-
20 Defendant Negron's motion should be denied.
21

22 Respectfully submitted February 26, 2020,
23

24 
25 Jason Goodman, Defendant, Pro Se
26 252 7th Avenue Apt 6s
27 New York, NY 10001
28 (323) 744-7594
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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

ROBERT DAVID STEELE, et al.,

Plaintiff(s),

v.

Civil Action Number: 3:17-cv-00601-MHL

JASON GOODMAN, et al.,

Defendant(s).

LOCAL RULE 83.1(M) CERTIFICATION

I declare under penalty of perjury that:

No attorney has prepared, or assisted in the preparation of

DEFENDANT'S RESPONSE IN
OPPOSITION TO CO-DEFENDANT
NEGRON'S MOTION TO APPEAR BY
TELEPHONE

Jason Goodman


Signature of *Pro Se* Party

Executed on: February 26, 2020

OR

The following attorney(s) prepared or assisted me in preparation of _____.
(Title of Document)

(Name of Attorney)

(Address of Attorney)

(Telephone Number of Attorney)

Prepared, or assisted in the preparation of, this document

(Name of *Pro Se* Party (Print or Type))

Signature of *Pro Se* Party

Executed on: _____ (Date)

Circuit Court for Eastern Division Virginia

Case No. 3:17-cv-601-MHL

City or County

Robert David Steele and Earth Intelligence Networ

Jason Goodman

Name

Name

11005 LANGTON ARMS CT

252 7th avenue

6s

VS.

Street Address

Apt. #

Street Address

Apt. #

OAKTON, VA 22124 (571) 320-8573

New York NY 10001 (323) 744-7594

City State Zip Code Area Telephone

City State Zip Code Area Telephone

Plaintiff

Defendant

CERTIFICATE OF SERVICE

(DOMREL58)

I HEREBY CERTIFY that on this 26 day of February 2020 a copy

of the document(s) entitled DEFENDANT'S RESPONSE IN OPPOSITION TO CO-DEFENDANT NEGRON'S MOTION TO APPEAR BY TELEPHONE

Title of Document(s)

was/were mailed, postage prepaid to:

Fernando Galindo Clerk of the Court

Opposing Party or His/Her Attorney

701 East Broad Street

Address

Richmond VA 23219

City State Zip

February 26, 2020

Date

Signature



Circuit Court for Eastern Division Virginia

Case No. 3:17-cv-601-MHL

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was/were mailed, postage prepaid to:

Terry Frank

Opposing Party or His/Her Attorney

Kaufman and Canoles

Address

1021 East Cary Street Richmond VA 23219

City

State

Zip

February 26, 2020

Date

Signature



Circuit Court for Eastern Division Virginia

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Title of Document(s)
was/were mailed, postage prepaid to:

Steven S Biss

Opposing Party or His/Her Attorney

300 West Main Street Suite 102

Address

City Charlottesville State VA Zip 22903

February 26, 2020

Date

Signature

